

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROBERT CLARK

and

## A.D.A. ACCESS TODAY

**Plaintiffs,**

**y.**

**PHILA-DELI, INC.,**

**Defendant.**

**JOHN DOE (1-10), ABC CORP. (1-10)**

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**CV: 02-CV-2853**

## ORDER

AND NOW, on this \_\_\_\_\_ day of August, 2002, after consideration of Defendant PHILA-DELI, INC.'S uncontested Motion to Extend Time Period to Respond to Plaintiff's Complaint, it is **HEREBY ORDERED and DECREED** that the Motion is **GRANTED**, and PHILA-DELI, INC. shall answer the Complaint on or before Monday, September 23, 2002.

United States District Court

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ROBERT CLARK**

**and**

## A.D.A. ACCESS TODAY

**Plaintiffs,**

**V.**

**PHILA-DELI, INC.,**

**Defendant.**

**JOHN DOE (1-10), ABC CORP. (1-10)**

**CV: 02-CV-2853**

**FILED AUG 15 2002**

**DEFENDANT'S UNCONTESTED MOTION  
TO EXTEND TIME PERIOD TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant PHILA-DELI, INC., by and through its undersigned counsel, hereby files its uncontested Motion to Extend the Time Period to Respond to Plaintiff's Complaint and in support thereof, states:

1. Movant is the Defendant in the above-captioned action, which was commenced by Plaintiffs' filing of a complaint on or about May 13, 2002.
2. The Defendant has agreed to waive service of the Summons and Complaint under Rule 4 of the Federal Rules of Civil Procedure and has asked Plaintiff to extend the time period to respond to the Complaint because the parties are seriously considering resolving this matter but need additional time to do so.
3. In response to Defendant's request, the Plaintiff has agreed to extend the time period to respond to the Complaint until Monday, September 23, 2002, and has requested that Defendant confirm and memorialize this agreement by filing the within uncontested motion.

4. This court previously granted the defendant's Uncontested Motion to Extend Time Period to Respond to Plaintiff's Complaint, and permitted Defendant until August 19, 2002 to Answer.

5. Because of vacation schedules and other commitments of the parties and lawyers, the matter has yet to resolve and the parties seek until September 23, 2002 for defendant to answer, and to enable the parties to resolve this matter.

WHEREFORE, Defendant PHILA-DELI, INC. respectfully requests that this Court grant its uncontested Motion to Extend the Time Period to Respond to Plaintiff's Complaint and enter the attached Order.

OBERMAYER REBMANN MAXWELL & HIPPEL LLP

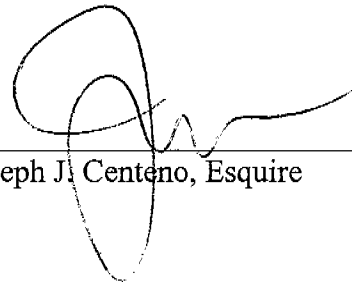
BY: 

JOSEPH J. CENTENO  
1617 John F. Kennedy Boulevard  
One Penn Center - 19<sup>th</sup> Floor  
Philadelphia, PA 19103-1895  
(215)665-3107

Attorneys for Defendant PHILA-DELI, INC.

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1(B)**

I, JOSEPH J. CENTENO, ESQUIRE, am counsel for Movant PHILA-DELI, INC. and hereby certify pursuant to Rule 7.1(b) of the Local Rules of Civil Procedure that the within Motion is UNCONTESTED.

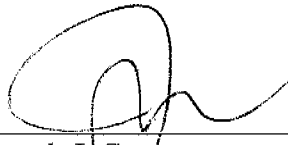
  
\_\_\_\_\_  
Joseph J. Centeno, Esquire

Dated: August 15, 2002

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of August, 2002, I caused the foregoing Defendant PHILA-DELI, INC.'s Uncontested Motion To Extend Time Period to Respond to Plaintiff's Complaint to be served via First-Class Mail, postage prepaid on the following:

Jason L. Brodsky, Esquire  
Brodsky & Smith, LLC  
11 Bala Avenue, Suite 39  
Bala Cynwyd, PA 19004

  
\_\_\_\_\_  
Joseph J. Centeno